

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Andrew L. Dudzek,
Jennifer L. Dudzek,

Debtors.

Case No. 22-12581-amc

Chapter 13

Debtors' Motion to Modify Chapter 13 Plan

AND NOW, Debtors Andrew L. Dudzek and Jennifer L. Dudzek, by and through their attorney, moves this Court for approval of a modified chapter 13 plan. In support of this motion, the Debtors states as follows:

1. The Debtors hereby requests that the Third Amended Chapter 13 Plan filed as ECF No. 65 be approved by the court and adopted as the confirmed chapter 13 plan.

2. The proposed plan: (i) adjusts payment on the secured claim of PennyMac Loan Services LLC as consistent with that creditor's amended claim, (ii) provides for payment of attorney fees to the Debtors' counsel for post-confirmation services, and (iii) adjusts plan payments consistent with the Debtors' recent reduction in monthly income.

3. The Debtor is a Philadelphia police officer and was injured while at work in October 2023. Since then, he has received disability pay from the city that is substantially lower than his regular income at the time this case was filed. The Debtor intends to return to work within the next twelve months but does not know when.

NOW, THEREFORE, the Debtors asks this Court to approve the modified plan and to grant such other relief in their favor as may be necessary and proper under the law.

Date: April 22, 2024

CIBIK LAW, P.C.
Counsel for Debtors

By: /s/ Michael A. Cibik
Michael A. Cibik (#23110)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com